

**EXHIBIT 17  
FILED UNDER SEAL**

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

Case No. 3:17-cv-00939-WHA

WAYMO LLC,

Plaintiff,

V.

UBER TECHNOLOGIES, INC.;

OTTOMOTTO LLC;

OTTO TRUCKING,

**VIDEOTAPED DEPOSITION OF**

REPORTED BY:

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1	the thrust, meaning that, yes, if these terms	12:01:02
2	are executed, then Otto Trucking will be the	12:01:07
3	exclusive field of use licensee for Uber's	12:01:13
4	AV-related technology.	12:01:17
5	Q. In those circumstances, Uber won't	12:01:17
6	be allowed to use its own AV technology that	12:01:20
7	it's developed in the trucking field; correct?	12:01:24
8	MR. BRUN: Objection, form.	12:01:27
9	A. Well, Uber will be Otto Trucking	12:01:29
10	in the sense that they will be a 50 percent	12:01:31
11	owner, so they will get the benefit through	12:01:33
12	that participation.	12:01:36
13	Q. The license to Otto Trucking	12:01:37
14	happens if Uber doesn't acquire Otto Trucking,	12:01:39
15	right?	12:01:43
16	MR. BRUN: Same objection.	12:01:44
17	A. Yes, true. Fair correction.	12:01:47
18	Q. Just so that we have a clear	12:01:53
19	record, in the event that Uber does not acquire	12:01:55
20	Otto Trucking, Otto Trucking will have an	12:01:58
21	exclusive field of use license regarding Uber's	12:02:00
22	autonomous vehicle technology in the trucking	12:02:03
23	field; correct?	12:02:06
24	MR. BRUN: Objection, form.	12:02:07
25	A. Yes, generally speaking, that's	12:02:13

1	true.	12:02:14
2	Q. In those circumstances, Uber will	12:02:16
3	not be able to use the autonomous vehicle	12:02:18
4	technology it developed in the trucking field;	12:02:21
5	correct?	12:02:24
6	MR. BRUN: Same objection.	12:02:25
7	A. That's generally my understanding	12:02:26
8	of the term sheet, correct.	12:02:28
9	Q. Do you know the current status of	12:02:30
10	potential acquisition discussions between Uber	12:02:32
11	and Otto Trucking?	12:02:35
12	A. No, sir, I don't believe that an	12:02:38
13	acquisition has taken place. I understand	12:02:41
14	we're in a window where that's possible.	12:02:43
15	Q. Do you know whether	12:02:45
16	Mr. Levandowski's firing from Uber has affected	12:02:46
17	the potential acquisition of Otto Trucking by	12:02:49
18	Uber?	12:02:52
19	A. I do not.	12:02:53
20	Q. Do you know how this lawsuit has	12:02:54
21	affected Uber's potential acquisition of Otto	12:02:56
22	Trucking?	12:03:00
23	A. I do not.	12:03:00
24	Q. Did you review Waymo's	12:03:07
25	interrogatory responses as part of your work in	12:03:08